

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DEVIN G. NUNES,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

Civil No.: 3:19-CV-00889

MOTION TO TRANSFER

Pursuant to 28 U.S.C. § 1404(a), Defendant Cable News Network, Inc., by and through undersigned counsel, hereby moves to transfer the case to the Southern District of New York. As set forth more fully in the Memorandum of Law submitted in support of this Motion, the grounds for the transfer are:

1. Plaintiff could have brought his claim in the Southern District of New York; and
2. The applicable factors to consider under § 1404(a), including the interests of justice and convenience of the parties and witnesses, support transfer to the Southern District of New York.

Defendant respectfully requests oral argument on this motion.

WHEREFORE, Defendant respectfully requests that the Court enter an order granting the Motion to Transfer.

Dated: January 17, 2020

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ Dane H. Butswinkas

Dane H. Butswinkas (VSB No. 30562)

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of January 2020, I caused a true and correct copy of the foregoing Motion to Transfer of Defendant Cable News Network, Inc. to be served on counsel of record via the Court's CM/ECF system.

/s/ Dane H. Butswinkas

Dane H. Butswinkas